

EXHIBIT B

Exhibit 2 - Berry Hours

Client	Trans Date	Tmk	P	H Tcode/ Task Co	Rate	Hours to Bill	Amount		Ref
Client ID 1718740.00				Wheatley Estate/Jennifer					
1718740.00	12/12/2017					2.00	1,140.00	Conference with client, conference with Dean Jackson, prepare documents, initialize file and file, instructions to bookkeeping, conference with RWG, initial letter to client.	ARCH
1718740.00	12/12/2017				150.00	2.00	300.00	Conference with client, conference with Dean Jackson, prepare documents, initialize file and file, instructions to bookkeeping, conference with RWG, initial letter to client.	ARCH
1718740.00	12/12/2017			1 A 999			-1,750.00	Credit for payment received	ARCH
1718740.00	12/20/2017					0.50	285.71	Copy and scan documents, initial letter to court, fill document with court.	ARCH
1718740.00	12/20/2017				150.00	0.50	75.00	Approved and send to court document with court.	ARCH
1718740.00	01/03/2018				175.00	2.00	350.00	Conference with clerk, copy and scan documents, letter with enclosures to clerk, deposit money into estate account, notify creditors, prepare creditor notice, email and letter to Jamestown News, telephone conference with US Department of Education, letter with documents to US Department of Education.	ARCH
1718740.00	01/26/2018								ARCH
1718740.00	02/08/2018								ARCH
1718740.00	02/13/2018				175.00	0.20	35.00	Review paid funeral expenses.	ARCH
1718740.00	02/20/2018				175.00	0.20	35.00	Review documents from client.	ARCH
1718740.00	03/05/2018				175.00	0.40	70.00	Prepare and file inventory.	ARCH
1718740.00	03/16/2018				175.00	1.00	175.00	Review file, prepare inventory, prepare for certification, prepare grand declaration letter with enclosures and affidavit.	ARCH
1718740.00	03/21/2018				175.00	0.20	35.00	Review and prepare from client, letter with enclosures to court.	ARCH
1718740.00	03/21/2018				175.00	0.20	35.00	Review and prepare from client.	ARCH
1718740.00	03/26/2018				175.00	0.75	131.25	Review documents for certification, prepare documents, letter to court, fill document with court.	ARCH
1718740.00	04/09/2018				175.00	0.20	35.00	Copy and scan approved inventory, send to court.	ARCH
1718740.00	04/09/2018				175.00	0.25	43.75	Review and prepare inventory, fill document.	ARCH
1718740.00	04/10/2018				175.00	0.25	43.75	Review and prepare inventory, fill document.	ARCH
1718740.00	04/13/2018			1 A 28	350.00	0.20	70.00	Receipt and review and respond to annuity matter.	ARCH
1718740.00	05/01/2018				175.00	0.20	35.00	Review documents, copy and scan documents.	ARCH
1718740.00	05/02/2018			1 A 28	375.00	0.50	187.50	Receipt and review structured	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer									
								annuity contract; raft letter to John Hancock.	
1718740.00	05/02/2018	1	A	35	375.00	0.50	187.50	Telephone call to Louis to discuss annuity, memo to file.	ARCH
1718740.00	05/03/2018	1	A	45	175.00	0.30	52.50	Conference with RVP, letter and	ARCH
1718740.00	05/22/2018	1	A	999	375.00		-2,000.00	Credit for payment received - ck #1002	ARCH
1718740.00	05/22/2018	1	A	229	375.00	0.20	75.00	Letter to Client. Follow up call to Dan Kelley.	ARCH
1718740.00	06/01/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	06/12/2018	1	A	35		0.20	0.00	Telephone call to attorney Dan Kelly, leave message concerning information needed.	ARCH
1718740.00	07/03/2018	1	A	45		1.00	0.00	REview file materials, telephone to John Hancock to discuss document request. Letter and materials to the company, instructions to legal assistant.	ARCH
1718740.00	07/03/2018	1	A	999			-2,000.00	Credit for payment received - ck #3197	ARCH
1718740.00	07/11/2018	1	A	45	175.00	0.30	52.50	Conference with RVP, letter and	ARCH
1718740.00	07/11/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	08/30/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00 08/30/2018	1	A	254	0.20	0.00	0.00	Instructions to Legal Assistant to	ARCH	
1718740.00	08/31/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	09/04/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	09/04/2018	1	A	35		0.50	0.00	Telephone call to attorney Saez regarding pending interpleader action pending to determine the correct beneficiary of the annuity..	ARCH
1718740.00	09/05/2018	1	A	45	175.00	0.30	52.50	Conference with RVP, letter and	ARCH
1718740.00	09/05/2018	1	A	28		0.20	0.00	Receipt and review approve letter, instructions to legal assistant.	ARCH
1718740.00	09/06/2018	1	A	28		0.20	0.00	Receipt and review message from counsel for insurer.	ARCH
1718740.00	09/07/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	09/11/2018	1	A	45	175.00	0.30	52.50	Telephone call to attorney Dan Kelly, leave message concerning	ARCH
1718740.00	09/11/2018	1	A	28		0.70	262.50	Receipt and review package from client regarding litigation pending in federal court.	ARCH
1718740.00	09/11/2018	1	A	254		0.20	75.00	Instructions to Legal Assistant .	ARCH
1718740.00	09/12/2018	1	A	254		0.30	112.50	Instructions to Legal Assistant to	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	09/12/2018	11	A 45		0.50	87.50	ARCH
						prepare file materials for research issues.	
1718740.00	09/17/2018	1	A 45		0.50	187.50	ARCH
						Review complaint and summons, conference with RWG, copy and scan documents	
1718740.00	09/17/2018	1	A 35		0.20	75.00	ARCH
						Calls to locate counsel in Texas; instructions to legal assistant for letter; call and message to plaintiffs counsel.	
1718740.00	09/17/2018	1	A 24	350.00	0.30	112.50	ARCH
						Telephone call to executor to update on current status of Texas case.	
1718740.00	09/17/2018	1	A 254	350.00	0.20	75.00	ARCH
						Office conference with Doug, review memo, procedural concerns.	
1718740.00	09/17/2018	2	A 45	350.00	1.50	525.00	ARCH
						Instructions to Legal Assistant .	
1718740.00	09/17/2018	11	A 45	175.00	0.90	157.50	ARCH
						Receipt and review of estate materials and federal lawsuit.	
						Conference with RWG, prepare stipulation, prepare letter to opposing attorney, email conference with client	
1718740.00	09/18/2018	1	A 28		1.00	375.00	ARCH
						Receipt and review materials, research and memo from Doug regarding Ohio divorce law.	
1718740.00	09/18/2018	11	A 45	175.00	0.50	87.50	ARCH
						Review research, conference with MDB, email documents to John Hancock attorney, copy to client	
1718740.00	09/18/2018	1	A 45	350.00	1.00	375.00	ARCH
						set up litigation file for Federal District Court in Texas. Memo regarding issues to be heard and initial thoughts on discovery.	
1718740.00	09/18/2018	11	A 45	175.00	0.50	87.50	ARCH
						Review memo's conference with RWG, conference with MDB, email conference with John Hancock attorney	
1718740.00	09/18/2018	1	A 45	175.00	1.00	375.00	ARCH
						Review research, conference with MDB, email documents to John Hancock attorney, copy to client	
1718740.00	09/18/2018	2	A 45	350.00	1.50	525.00	ARCH
						Review of File materials, research issue of annuity change beneficiary requirements; email to RWG attorney, searched John Hancock on Internet re beneficiary change forms available.	
1718740.00	09/19/2018	1	A 35		0.50	187.50	ARCH
						Telephone call to Dan Kelly per request of Louis to discuss some background on the case.	
1718740.00	09/19/2018	1	A 45	350.00	0.20	75.00	ARCH
						Return call to attorney Bohorst, leave message.	
1718740.00	09/19/2018	1	A 47	350.00	0.30	112.50	ARCH
						Draft letter to Louis Wheatley.	
1718740.00	09/19/2018	1	A 35	350.00	0.50	187.50	ARCH
						Telephone call to Dan Kelly per request from Louis to discuss posture of case and some thoughts on conflict of laws.	
1718740.00	09/20/2018	1	A 34	350.00	0.50	187.50	ARCH
						Telephone call from Jennifer Berhorst to discuss some preliminary matters.	

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Client ID 1718740.00 Wheatley Estate/Jennifer						
1718740.00	09/20/2018	11 A 45	175.00	0.20	35.00	ARCH
1718740.00	09/20/2018	11 A 45	175.00	1.00	175.00	Conference with RWG, review and sort emails, letter to client, letter to Clay Moore, copy to client ARCH
1718740.00	09/20/2018	1 A 45	350.00	1.00	375.00	Discussions with Doug; memo to file re theory of our case. ARCH
1718740.00	09/24/2018	1 A 45		0.20	75.00	Request copy of annuity policy from attorney Berhorst. ARCH
1718740.00	09/24/2018	1 A 34		0.70	262.50	Telephone call from Pam Wheatley, memo to file. ARCH
1718740.00	09/25/2018	1 A 254	375.00	0.20	75.00	Instructions to Legal Assistant for letter to client. ARCH
1718740.00	09/25/2018	1 A 45	175.00	0.20	35.00	ARCH
1718740.00	09/25/2018	1 A 45	175.00	0.20	35.00	ARCH
1718740.00	09/25/2018	9 A 45	125.00	2.00	250.00	Organize file materials per MDB. ARCH
1718740.00	09/27/2018	1 A 45	375.00	0.40	150.00	Email to Herbert Jansen in Houston, Texas. ARCH
1718740.00	09/28/2018	1 A 35	375.00	1.00	375.00	Telephone call to Herb Jansen to discuss local representation and brief review of the case. ARCH
1718740.00	10/03/2018	1 A 45	375.00	0.50	187.50	Receive message from Pam Wheatley, respond, copy to Doug. ARCH
1718740.00	10/03/2018	9 A 45	125.00	1.50	187.50	Begin preparation of draft of responsive pleadings for review by MDB. ARCH
1718740.00	10/04/2018	11 A 45	175.00	0.20	35.00	Conference with RWG, letter to TX attorney, copy to clients ARCH
1718740.00	10/04/2018	2 A 45	350.00	3.50	1,225.00	Work on preparation of answer to John Hancock complaint. ARCH
1718740.00	10/04/2018	9 A 45	125.00	1.50	187.50	Revisions to draft of responsive pleadings per MDB. ARCH
1718740.00	10/05/2018	2 A 45	350.00	2.50	875.00	Initial preparation of counterclaims. ARCH
1718740.00	10/05/2018	9 A 45	125.00	1.50	187.50	Additional revisions to draft of responsive pleadings per MDB; finalize for review by MDB. ARCH
1718740.00	10/08/2018	2 A 45	350.00	2.50	875.00	Review and revisions to responsive pleadings, research issue of jurisdiction. ARCH
1718740.00	10/08/2018	9 A 45	125.00	1.40	175.00	Additional revisions to draft of responsive pleadings. ARCH
1718740.00	10/09/2018	1 A 28	375.00	0.50	187.50	ARCH
1718740.00	10/09/2018	1 A 28	375.00	0.50	187.50	Receipt and review answer, crossclaim and counterclaims. ARCH
1718740.00	10/09/2018	1 A 45	375.00	0.20	75.00	One correction/addition to the responsive pleadings. ARCH
1718740.00	10/09/2018	2 A 45	350.00	1.00	350.00	Revisions to answers and responsive pleadings. Receipt and review of feedback from RWG re edits to complaint draft. Research of federal diversity jurisdiction. Revisions to complaint. ARCH
1718740.00	10/09/2018	9 A 45	125.00	1.70	212.50	Office conference with MDB to finalize responsive pleadings; prepare exhibit attachments; email ARCH

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Client	Trans Date	Tmk	H Tcode/ P Task Co	Rate	Hours to Bill	Amount		Ref
Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	10/10/2018						final version of document to MDB.	ARCH
1718740.00	10/10/2018							ARCH
1718740.00	10/12/2018	2	A 1	350.00	1.00	350.00	Receipt and review of Houston attorneys response, review of responsive pleadings, draft reply email re changes.	ARCH
1718740.00	10/12/2018	1	A 28	375.00	0.50	187.50	Receipt and review revised pleadings and attachments.	ARCH
1718740.00	10/12/2018	2	A 45	300.00	1.20	365.26	Conference call With Houston attorney. Receipt and review revised pleading; response to Houston attorney regarding the exhibit change. Review of the final responsive pleadings. Telephone message left with Houston attorney	ARCH
1718740.00	10/15/2018	1	A 34	375.00	0.30	112.50	Telephone call from Herb to confirm filing answer; discussions regarding procedure.	ARCH
1718740.00	10/15/2018	9	A 45	125.00	2.50	312.50	Prepare Motion for admission Pro Hac Vice for review by MDB; calls to Clerk's office in Houston, Texas re: registration of MDB and RWG in Southern District of Texas; emails to MDB and RWG re: procedure for registering for online filing service.	ARCH
1718740.00	10/17/2018	1	A 45	375.00	0.20	75.00	Status on court filings.	ARCH
1718740.00	10/25/2018	1	A 45	375.00	0.20	75.00	Work on Annual Accounting	ARCH
1718740.00	10/30/2018	11	A 45	175.00	1.00	175.00	Work on Annual Accounting	ARCH
1718740.00	10/30/2018							ARCH
1718740.00	10/31/2018	1	A 34	375.00	0.40	150.00	Telephone call from Herb regarding Motion to Dismiss.	ARCH
1718740.00	10/31/2018							ARCH
1718740.00	11/01/2018	9	A 45	125.00	2.50	312.50	Receipt and review Motion to Dismiss of John Hancock; online research at Lexis to pull cases referenced in Hancock's brief for review by MDB and shepardize requested cases per MDB.	ARCH
1718740.00	11/01/2018	2	A 45	350.00	0.50	177.56	Receipt and review of motion to dismiss from plaintiff, Instructions to paralegal regarding deadlines for filing response.	ARCH
1718740.00	11/02/2018							ARCH
1718740.00	11/02/2018	9	A 45	125.00	1.00	125.00	Review local rules for Houston federal district with MDB re: deadline to file response to Hancock's Motion to Dismiss;	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
							prepare appropriate tickler reminders; general file review.	
1718740.00	11/02/2018	2	A	45	350.00	2.50	887.79	Begin research of interpleader requirements and impact of counterclaims. ARCH
1718740.00	11/02/2018	2	A	45	350.00	2.30	816.77	Continued research on interpleader issues. ARCH
1718740.00	11/05/2018							ARCH
1718740.00	11/05/2018	2	A	45	350.00	1.80	639.21	Initial draft of memorandum in opposition to motion to dismiss. ARCH
1718740.00	11/06/2018	1	A	28	375.00	0.20	75.00	Receipt and review update on court filings, and payment of filing fees. ARCH
1718740.00	11/06/2018	11	A	45	175.00	0.60	105.00	Create litigation binder ARCH
1718740.00	11/06/2018	9	A	45	125.00	2.10	262.50	Begin preparation of draft of reply brief to Plaintiff's motion to dismiss counterclaim; prepare draft of Order denying Plaintiff's Motion to Dismiss for review by MDB. ARCH
1718740.00	11/08/2018	2	A	45	350.00	1.90	674.72	Receipt and review of memorandum of law. ARCH
1718740.00	11/07/2018	9	A	45	125.00	2.00	250.00	Continue work on draft of brief in opposition to Plaintiff's Motion to Dismiss. ARCH
1718740.00	11/07/2018	2	A	45	350.00	1.50	532.67	Review and revision of memorandum. ARCH
1718740.00	11/08/2018	9	A	45	125.00	3.00	375.00	Work on brief with MDB. ARCH
1718740.00	11/09/2018	2	A	45	350.00	0.20	71.02	Telephone conference with local counsel re filing of reply in opposition to motion. ARCH
1718740.00	11/09/2018	9	A	45	125.00	3.50	437.50	Revisions to draft of brief per MDB; finalize and prepare recommended changes for review by RWG and Janzen. ARCH
1718740.00	11/09/2018	2	A	1	350.00	0.20	70.00	Email exchange with Houston Texas attorney regarding brief ARCH
1718740.00	11/12/2018	1	A	45	375.00	0.20	75.00	Update from Herb on some procedural matters. ARCH
1718740.00	11/12/2018	1	A	28	375.00	0.50	187.50	Receipt and review of Houston attorney's final version of brief to submit to the court. ARCH
1718740.00	11/12/2018	9	A	45	125.00	1.50	187.50	Revisions to brief per Janzen; finalize; email to Janzen for filing with Court; update pleading index and notebook. ARCH
1718740.00	11/12/2018	9	A	45	125.00	1.00	125.00	Begin draft of response to Defendant Ward's crossclaim per MDB. ARCH
1718740.00	11/13/2018							ARCH
1718740.00	11/13/2018	9	A	45	125.00	1.50	187.50	Online research at PACER to review all filings and update pleadings notebook per MDB; finalize initial ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer									
1718740.00	11/13/2018	2	A	1	350.00	0.20	70.00	draft of response to Ward's crossclaim; revisions per MDB. Email exchanges with Houston Texas attorney regarding wards cross-claim against the estate	ARCH
1718740.00	11/13/2018	2	A	1	350.00	0.20	70.00	Email exchanges with Houston Texas attorney regarding stipulation from Wards attorney	ARCH
1718740.00	11/14/2018	2	A	1	350.00	0.20	70.00	Email exchange with Houston Texas attorney regarding specific wording of stipulation	ARCH
1718740.00	11/15/2018	9	A	45	125.00	0.70	87.50	Call to Clerk's Office in Houston, Texas to confirm method for filing Motion to Appear Pro Hac Vice; prepare motion and review with MDB; email copy to Janzen for filing; copy to MDB, RWG and Connie.	ARCH
1718740.00	11/16/2018	11	A	45	125.00	0.20	25.00	Telephone call regarding case	ARCH
1718740.00	11/16/2018	2	A	1	350.00	0.40	140.00	Receipt and review of reply brief from John Hancock's attorney	ARCH
1718740.00	11/19/2018	9	A	45	125.00	1.00	125.00	Online search at PACER for status of filed documents; update pleadings index and notebook.	ARCH
1718740.00	11/20/2018	9	A	45	125.00	0.50	62.50	Draft of letter to Louis Wheatley regarding case status update for review by MDB.	ARCH
1718740.00	11/20/2018	2	A	1	350.00		0.00	Draft of stance letter report to client-- no charge	ARCH
1718740.00	11/20/2018	2	A	45	350.00	0.10	35.00	Email to Houston Texas attorney regarding filing of stipulation	ARCH
1718740.00	11/21/2018	9	A	45	125.00	2.50	312.50	Prepare Stipulation for signature by MDB, Janzen and Moore re: service of Defendant Ward's crossclaim on client and deadline for response; email to MDB; email registration form to Clerk's Office in Houston to effectuate MDB's assignment of login information for ECF system; prepare MDB's Entry of Appearance; email to Janzen for electronic filing; check PACER system for status of court filings; calls from Janzen regarding documents to be filed with District Court.	ARCH
1718740.00	11/27/2018	11	A	45	125.00	0.20	25.00	Prepare stipulation for signature by RWG	ARCH
1718740.00	11/30/2018	2	A	1	350.00	1.50	525.00	Begin preparation of Motion and memorandum of law.	ARCH
1718740.00	11/30/2018	9	A	45	125.00	0.50	62.50	Check PACER system and update pleadings notebook.	ARCH
1718740.00	11/30/2018	2	A	1	350.00	0.20	70.00	Email exchange with Houston attorney regarding filing a stipulation	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	11/30/2018	2	A	1	350.00	0.20	70.00	ARCH
							of time regarding the filing of responsive pleadings	
1718740.00	12/03/2018	1	A	254	375.00	0.20	75.00	ARCH
							Email to Houston attorney regarding deadlines or filing motion to dismiss wards cross-claim.	
1718740.00	12/03/2018	2	A	1	350.00	2.30	805.00	ARCH
							Review email from client re proceedings.	
1718740.00	12/04/2018	9	A	45	125.00	2.50	312.50	ARCH
							Begin research on motion to dismiss as it relates to law of Ohio, Virginia, North Carolina and Texas.	
1718740.00	12/04/2018	2	A	1	350.00	1.70	595.00	ARCH
							Prepare Notice of Appearance for RWG; email to Janzen for filing with Court; work on draft of Motion to Dismiss Ward's crossclaims and memorandum; prepare draft of Order dismissing crossclaims for review by MDB.	
1718740.00	12/05/2018	9	A	45	125.00	2.40	300.00	ARCH
							Continue research of Fifth Circuit opinions regarding choice of law.	
1718740.00	12/06/2018	9	A	45	125.00	3.00	375.00	ARCH
							Continue work on draft of Motion to Dismiss Ward crossclaims and memorandum; online search at PACER; update pleadings index and notebook.	
1718740.00	12/07/2018	1	A	28	375.00	0.50	187.50	ARCH
							Continue work on draft of motion to dismiss/memorandum; online research at Lexis to confirm correct cites of case law in memorandum.	
1718740.00	12/07/2018	9	A	45	125.00	3.20	400.00	ARCH
							Receipt and review proposed motion and order to dismiss Ward claims.	
1718740.00	12/07/2018	2	A	45	350.00	1.50	525.00	ARCH
							Assist MDB with revisions to Motion to Dismiss Ward Crossclaim and accompanying brief; check citations and case law quotations online at Lexis Advance; revisions to draft of proposed Order dismissing motion to dismiss.	
1718740.00	12/10/2018	2	A	45	350.00	0.10	35.00	ARCH
							Reviewing and revisions to memorandum of law, email Email to a Houston attorney regarding deadlines for filing.	
1718740.00	12/12/2018	9	A	45	125.00	2.00	250.00	ARCH
							Receipt and review of notification from US District Court of receipt of interpleader funds.	
1718740.00	12/12/2018	1	A	28	375.00	0.30	112.50	ARCH
							Final revisions to draft of Motion to Dismiss and accompanying brief; finalize draft of Order; email copies of both to Janzen for filing in Houston District.	
1718740.00	12/13/2018	9	A	45	125.00	2.50	312.50	ARCH
							Receipt and review motion to dismiss counterclaim by defendant Ward.	
							Continue work on brief; prepare chart of annuity payments per MDB.	

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Client	Trans Date	Tmk	H Tcode/ P Task Co	Rate	Hours to Bill	Amount		Ref
Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	12/14/2018	1	A 28	375.00	0.30	112.50	Receipt and review brief in support of motion to dismiss cross claims.	ARCH
1718740.00	12/14/2018	9	A 45	125.00	3.50	437.50	Finalize brief; email to Janzen for filing in District Court.	ARCH
1718740.00	12/14/2018	2	A 45	350.00	0.10	35.00	Receipt and review of notice of District Court regarding receipt of interpleader funds.	ARCH
1718740.00	12/17/2018	9	A 45	125.00	0.50	62.50	Check PACER service to confirm filing of brief; update pleadings index and notebook.	ARCH
1718740.00	12/19/2018	2	A 45	350.00		0.00	Email case status report to Ms. Wheatley (no charge)	ARCH
1718740.00	12/20/2018	1	A 28	375.00	0.50	187.50	Receipt and review recent filings, update to client, status report.	ARCH
1718740.00	12/20/2018	9	A 45	125.00	1.50	187.50	Online search at PACER re: status of case; update pleadings index and notebook; prepare case law notebook per MDB.	ARCH
1718740.00	12/31/2018	2	A 45	350.00	0.30	105.00	Receipt and review of email the attached summons served on the defendant Wheatley by the Fulton County Sheriff; email to attorney Janzen re new development and alternative courses of action in response,	ARCH
1718740.00	01/02/2019	1	A 45	375.00	0.50	187.50	Receipt and review recent filings by Ward.	ARCH
1718740.00	01/02/2019	1	A 28	375.00	0.50	187.50	Receipt and review recent filings by Ward.	ARCH
1718740.00	01/03/2019	9	A 45	125.00	0.50	62.50	Email Clerk's Office in Houston, Texas regarding status of MDB's login information for ECF filing system; emails to and from Janzen re: status; review PACER service and update pleadings index.	ARCH
1718740.00	01/04/2019	9	A 45	125.00	0.50	62.50	Check PACER service for status of recently filed documents; update pleadings index and notebook; confirm login information to ECF filing system with MDB.	ARCH
1718740.00	01/04/2019	2	A 45	350.00	0.20	70.00	Receipt and review of scheduling order from District Court Judge.	ARCH
1718740.00	01/07/2019	2	A 45	350.00	0.50	175.00	Review of third-party complaint filed by defendant Ward, review of opposition filed by defendant Ward.	ARCH
1718740.00	01/07/2019	2	A 45	350.00	3.10	1,085.00	Research: Ohio law re automatic revocation of beneficiary designation by divorce. (Total hrs 3.1; billable 1.5)	ARCH
1718740.00	01/07/2019	9	A 45	125.00	1.00	125.00	Online review of PACER filings to update pleadings notebook and index; review Ward's Answer and Amended Answer for differences per MDB; review with MDB. (Total hrs 1.0; billable .80)	ARCH
1718740.00	01/08/2019	2	A 45	350.00	0.20	70.00	Telephone call from Herb re	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	01/08/2019	9	A 45	125.00	4.50	562.50	ARCH
						settlement overtures. Call from Herb Janzen in Houston, Texas regarding status of case and upcoming scheduling conference; legal research pertaining to issue raised by Defendant Ward pertaining to impact of R.C. 1339.63 on case; review case law with MDB; memo to MDB with outline of case law; begin draft of reply brief in response to Defendant Ward's opposition to Estate's motion to dismiss crossclaim.	
1718740.00	01/08/2019	2	A 1	350.00	0.80	280.00	ARCH
						Initial draft of motion for leave to file reply to his opposition. (Total hrs .80; billable .30)	
1718740.00	01/09/2019	2	A 45	350.00	3.50	1,225.00	ARCH
						Receipt and review of draft reply to Ward's response in opposition to motion to dismiss. (Total hrs 3.5; billable 2.0)	
1718740.00	01/09/2019	9	A 45	125.00	3.80	475.00	ARCH
						Revisions to drafts of Motions to Dismiss, Orders Granting Motions to Dismiss and reply brief in opposition to Ward's crossclaim for review by MDB; online search at PACER regarding status of filings; revisions to all drafts for review by MDB. (Total hrs 3.8; billable 2.7)	
1718740.00	01/10/2019	9	A 45	125.00	2.00	250.00	ARCH
						Review Plaintiff's Motion to Strike; review PACER records; update pleadings index and notebook; revisions to drafts of Motion for Leave to file reply to Ward's crossclaim, reply brief and order per MDB; finalize; email to Janzen in Houston, Texas for review and filing.	
1718740.00	01/11/2019	9	A 45	125.00	1.00	125.00	ARCH
						Calls from Janzen re: status of filing of motion for leave to reply and related documents; receipt and review filed documents from Janzen; update pleadings index and notebook. (Total hrs 1.0; billable .30)	
1718740.00	01/14/2019	9	A 45	125.00	2.60	325.00	ARCH
						Additional revisions to Motion to Strike and proposed Order granting Motion to Strike; finalize per MDB; email to Janzen for filing with Southern District of Texas. (Total hrs 2.6; billable 1.7)	
1718740.00	01/15/2019	9	A 45	125.00	0.20	25.00	ARCH
						Email to Janzen to confirm additional document (Motion to Strike) to be filed in Southern District of Texas.	
1718740.00	01/15/2019	9	A 45	125.00	0.50	62.50	ARCH
						Revisions to draft of letter to Client with update on status of case per	

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						MDB.	
1718740.00	01/16/2019	9	A 45	125.00	0.50	62.50	Finalize draft of letter to Client re: update on status of case. ARCH
1718740.00	01/17/2019	2	A 45	350.00	0.20	70.00	Follow up emails to Houston Attorney regarding filing of responses and motion to dismiss Ward's cross-claim. ARCH
1718740.00	01/18/2019	2	A 45	350.00	2.50	875.00	Research of taxes attorneys fees law. Review of statutes and cases. (Total hours 2.5; billable hours 1.5) ARCH
1718740.00	01/22/2019	2	A 45	350.00	0.10	0.00	Follow-up email to attorney Janzen re filing confirmation. ARCH
1718740.00	01/22/2019	9	A 45	125.00	0.50	62.50	Check PACER service for status of filings; update pleadings index and notebook; general file review. ARCH
1718740.00	01/23/2019	1	A 45	375.00	0.50	187.50	Scheduling conference call among the attorneys. ARCH
1718740.00	01/23/2019	1	A 45	375.00	0.50	187.50	Conference with H TFB; review scheduling order ARCH
1718740.00	01/23/2019	1	A 45	375.00	0.30	112.50	Conference call among attorneys to prepare scheduling order. ARCH
1718740.00	01/23/2019	2	A 45	350.00	0.10	35.00	Receipt and review of opposing Attorney Consent to scheduling order. ARCH
1718740.00	01/23/2019	2	A 45	350.00		0.00	Receipt and review of payment notice no charge. ARCH
1718740.00	01/24/2019	2	A 45	350.00	2.40	840.00	email to client with copy of scheduling order draft. ARCH
1718740.00	01/24/2019	9	A 45	125.00	0.50	62.50	Check PACER service for status of filings; update pleadings index and notebook; receipt and review scheduling order. ARCH
1718740.00	01/25/2019	2	A 45	350.00		-1,972.50	Fee amount deferred pending consideration of results obtained. ARCH
1718740.00	01/25/2019	2	A 45	350.00	0.50	175.00	Receipt and review of scheduling order from opposing counsel ARCH
1718740.00	01/25/2019	2	A 45	350.00		0.00	Letter to client regarding billing. ARCH
1718740.00	01/25/2019	2	A 45	350.00	0.10	35.00	Receipt and review of scheduling order from opposing counsel. ARCH
1718740.00	01/25/2019	2	A 45	350.00	0.10	35.00	Receipt and review of email from opposing attorney Re: agreement with scheduling order. ARCH
1718740.00	01/25/2019	2	A 45	350.00	0.10	35.00	Receipt and review of response from trial court administrator regarding scheduling order. ARCH
1718740.00	01/28/2019	2	A 45	350.00	1.50	525.00	Draft of the discovery. ARCH
1718740.00	01/28/2019	9	A 45	125.00	0.50	62.50	Check online PACER service re: status of case; update pleadings index and notebook. ARCH
1718740.00	01/28/2019	2	A 45	350.00	0.40	140.00	Initial draft of discovery. ARCH
1718740.00	01/29/2019	9	A 45	125.00	2.00	250.00	Prepare initial draft of discovery requests to serve on Plaintiff for review by MDB; revisions per MDB. ARCH
1718740.00	01/30/2019	1	A 28	375.00	0.30	112.50	Receipt and review discovery to the Plaintiff. ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	01/30/2019	2	A 45	350.00	1.00	350.00	Research on Texas law regarding bad faith insurance claims; East Texas statutes regarding attorneys fees and do initial beginning draft of amendment.	ARCH
1718740.00	01/30/2019	9	A 45	125.00	1.50	187.50	Revisions to draft of discovery requests; prepare letters and transmittals to opposing counsel for service of discovery requests.	ARCH
1718740.00	01/31/2019	2	A 45	350.00	3.80	1,330.00	Research Texas law regarding choice of law principles for assessment of attorney's fees; finish draft of amendment;	ARCH
1718740.00	01/31/2019	9	A 45	125.00	2.40	300.00	Receipt and review recent filing from opposing counsel; check PACER service and update pleadings index and notebook; prepare draft of Motion for Leave to file Amended Counterclaim for review by MDB.	ARCH
1718740.00	02/01/2019	2	A 45	350.00	1.80	630.00	revise draft of amendment to complaint.	ARCH
1718740.00	02/01/2019	1	A 28	375.00	1.00	375.00	Receipt and review proposed discovery, motions, proposed orders, updated discovery, and Requests for Admissions.	ARCH
1718740.00	02/01/2019	9	A 45	125.00	2.00	250.00	Additional revisions to drafts of discovery requests and motion for leave to file amended counterclaim per MDB.	ARCH
1718740.00	02/04/2019	9	A 45	125.00	0.60	75.00	Receipt and review Defendant Ward's Notice of Withdrawal of Amended Answer, Counterclaims and Third Party Complaint; review with MDB; online search at PACER to check status of case; update pleadings index and notebook.	ARCH
1718740.00	02/04/2019	2	A 53	350.00	0.20	70.00	(NO CHARGE) Receipt and review of Defendant Ward's dismissal of amendment to cross-claim, telephone; to attorney Janzen regarding clarification.	ARCH
1718740.00	02/05/2019	2	A 45	350.00	0.70	245.00	Review and edit's of request for production of documents and requests for admissions; final review of motion to amend pleadings regarding attorneys fees.	ARCH
1718740.00	02/05/2019	9	A 45	125.00	2.00	250.00	Office conference with MDB to review and finalize discovery requests and Motion for Leave of Court to add 4th Counterclaim; finalize both documents; finalize letter to attorneys for Plaintiffs transmitting discovery requests; fax and regular mail to Plaintiff's counsel; copies to Ward's attorney	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						and US Department of Justice attorney via fax and regular mail; blind copies to Janzen and Client; letter to all opposing attorneys via fax and regular mail with copy of Motion for Leave of Court to add 4th Counterclaim; blind copies to Janzen and Client; review PACER online records for status of case.	
1718740.00	02/05/2019	9	A 53	125.00	0.50	62.50 (NO CHARGE) General file review and organization.	ARCH
1718740.00	02/06/2019	2	A 53	350.00	0.20	70.00 (NO CHARGE) Receipt and review of email from client.	ARCH
1718740.00	02/11/2019	1	A 45	375.00	0.20	75.00 Status of proceeding, discovery and motions.	ARCH
1718740.00	02/13/2019	2	A 45	350.00	0.10	35.00 Receipt and review of of email from US Attorney re consent to motion.	ARCH
1718740.00	02/13/2019	2	A 45	350.00	0.30	105.00 Receipt and review of consent of remaining attorneys to Wheatley's motion to amend.	ARCH
1718740.00	02/13/2019	9	A 45	125.00	2.00	250.00 Revisions to draft of Motion for Leave to add Fourth Counterclaim on behalf of Client per MDB; finalize; prepare draft of Order allowing Motion to Leave; revisions to draft of Order; finalize; online PACER search for status of case; update pleadings notebook; email motion and proposed order to Herb Janzen in Houston, Texas for filing in federal court.	ARCH
1718740.00	02/14/2019	9	A 45	125.00	1.00	125.00 Check online PACER service and update pleadings index and notebook with current pleadings and filings; prepare excel spreadsheet for interpleader funds paid into court by Plaintiff per MDB.	ARCH
1718740.00	02/21/2019	1	A 45	375.00	0.30	112.50 Conference with RWG - no charge	ARCH
1718740.00	02/22/2019	2	A 34	350.00	0.50	175.00 Initial receipt and review of Ward's motion to amend answer, counter claim, cross claim and 3rd party complaint.	ARCH
1718740.00	02/22/2019	2	A 45	350.00	0.30	105.00 Instructions to paralegal.	ARCH
1718740.00	02/25/2019	9	A 45	125.00	1.00	125.00 Review Ward's recent First Amended Answer, Counterclaim, Crossclaim and Third Party Complaint against prior filed document per MDB; review online PACER service for updated pleadings.	ARCH
1718740.00	02/26/2019	2	A 1	350.00	0.82	287.00 Update to client regarding Ward's recent filing.	ARCH
1718740.00	02/27/2019	9	A 45	125.00	0.50	62.50 Online PACER service review for status of case; update pleadings	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	02/27/2019	2	A 1	350.00	0.20	70.00	index and notebook. Email to Houston Texas attorney regarding obtaining transcript of telephonic motion hearing.	ARCH
1718740.00	02/28/2019	2	A 45	350.00	3.50	1,225.00	Research in preparation memorandum in opposition to defendant wards Motion for leave of court to file third-party complaint and to amend cross-claim	ARCH
1718740.00	02/28/2019	2	A 45	350.00	0.50	175.00	Draft of Response in opposition to Defendant Ward's Motion for leave of court to file cross claim and third party complaint against Wheatley estate.	ARCH
1718740.00	03/04/2019	9	A 45	125.00	1.00	125.00	Prepare initial draft of Defendant Estate's Response and Memorandum in Opposition to Defendant Ward's Motion for Leave of Court to file First Amended Answer, Counterclaim, Crossclaim and Third-Party Complaint for review by MDB.	ARCH
1718740.00	03/04/2019	9	A 45	125.00	0.50	62.50	Check online PACER service for status of case; update pleadings index and notebook.	ARCH
1718740.00	03/05/2019	2	A 1	350.00	2.50	875.00	Review discovery in preparation for telephone conference with opposing counsel. Teleconference with John Hancock's attorney. Researcher on points raised by opposing counsel. Email summary to attorneys Gabriel and Janzen.	ARCH
1718740.00	03/06/2019	2	A 1	350.00	0.30	105.00	Receipt and review of Notice of hearing, email to local counsel regarding requirements of local rules, email to client with regard to the hearing notice	ARCH
1718740.00	03/08/2019	1	A 45	375.00	0.50	187.50	Review several emails and recent filings to update on case status.	ARCH
1718740.00	03/08/2019	2	A 45	350.00	2.50	875.00	Receipt and review of email responses from attorney Janzen. editing of response in opposition to Ward's new motion to Amend cross-claim and third-party complaint.	ARCH
1718740.00	03/08/2019	9	A 45	125.00	2.00	250.00	Receipt and review all recent filings in court case; check PACER service for status of case and update pleadings notebook for review by MDB.	ARCH
1718740.00	03/08/2019	9	A 45	125.00	0.50	62.50	Revisions to draft of Memorandum per MDB.	ARCH
1718740.00	03/07/2019	1	A 28	375.00	0.50	187.50	Receipt and review notes from discussion with counsel for John Hancock. Comments as required.	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	03/07/2019	2	A 45	350.00	0.30	105.00	Clarification of Reply changes/edits with paralegal.	ARCH
1718740.00	03/07/2019	9	A 45	125.00	2.30	287.50	Continue work on Memorandum with MDB.	ARCH
1718740.00	03/07/2019	2	A 45	350.00	5.70	1,995.00	Research issue of Circuits outside of 5th rulings on structured settlement annuities. Incorporation of case law into the memorandum in opposition to Ward's motion. Review other federal cases.	ARCH
1718740.00	03/08/2019	2	A 45	350.00	0.10	35.00	Telephone call from Houston attorney Janzen, return call message left	ARCH
1718740.00	03/08/2019	9	A 45	125.00	3.00	375.00	Finalize memorandum and response to Defendant Ward's Amended Answer, Counterclaim, Crossclaim and Third-Party Complaint; prepare draft of Order; finalize; contacts with District Court regarding resetting MDB's password in order to e-file documents.	ARCH
1718740.00	03/11/2019	9	A 45	125.00	1.00	125.00	E-file response and memorandum in District Court; update pleadings index and notebook.	ARCH
1718740.00	03/12/2019	2	A 45	350.00	0.90	315.00	Receipt and review of Email from attorney Jenzen regarding settlement overture of the defendant Ward; email to client regarding offer and recommendation.	ARCH
1718740.00	03/12/2019	1	A 45	375.00	0.20	75.00	Discuss settlement overture with Doug.	ARCH
1718740.00	03/12/2019	1	A 28	375.00	0.30	112.50	Receipt and review client response to settlement offer.	ARCH
1718740.00	03/14/2019	9	A 45	125.00	0.50	62.50	Review online PACER records and update pleadings notebook; update chart of payments made into court pursuant to interpleader complaint.	ARCH
1718740.00	03/15/2019	1	A 45	375.00	0.20	75.00	Status on telephone conference with the Court.	ARCH
1718740.00	03/15/2019	2	A 45	350.00	0.30	105.00	Receipt and review of email from Attorney Janzen re Judge Ellison's ruling on the motions to dismiss.	ARCH
1718740.00	03/20/2019	1	A 28	375.00	0.20	75.00	Receipt and review Status report from court on recent hearing on motions.	ARCH
1718740.00	03/20/2019	2	A 45	350.00	0.30	105.00	Receipt and review of electronic notice of telephone motion hearing.	ARCH
1718740.00	03/25/2019						Redacted information	ARCH
1718740.00	03/27/2019	9	A 45	125.00	0.40	50.00	Call from Herb Janzen re: status of case; memo to MDB and RWG via email.	ARCH
1718740.00	03/27/2019	2	A 1	350.00	0.20	70.00	Telephone conference call with Herb Janzen attorney regarding the hearing transcript options.	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	04/09/2019	1	A 45	375.00	0.20	75.00	Update on case status. ARCH
1718740.00	04/09/2019	9	A 45	125.00	0.70	87.50	Legal research re: Rule 59(e) question; review with MDB. ARCH
1718740.00	04/09/2019	2	A 45	350.00	0.20	70.00	Email follow-up inquiry to John Hancock's attorney regarding status of discovery responses. ARCH
1718740.00	04/10/2019	9	A 53	125.00	1.00	125.00	(NO CHARGE) General file organization and review. ARCH
1718740.00	04/10/2019	2	A 45	350.00	0.30	105.00	Receipt and review of detailed response from client's wife, reply update. ARCH
1718740.00	04/10/2019	2	A 1	350.00	0.30	105.00	Email exchange with John Hancock's attorney re discovery response and mandatory disclosures. ARCH
1718740.00	04/11/2019	2	A 45	350.00	0.30	105.00	Receipt and review of opposing Attorney documents; email to paralegal re copying and research. ARCH
1718740.00	04/11/2019	9	A 45	125.00	1.30	162.50	Online legal research re: definition of abatement; receipt and review Plaintiff's Rule 26 discovery disclosures; prepare copies for review by MDB. ARCH
1718740.00	04/12/2019	2	A 45	350.00	2.50	875.00	Receipt and review of documents from John Hancock. ARCH
1718740.00	04/12/2019	2	A 45	350.00	0.70	245.00	Status report to client. Review of file. ARCH
1718740.00	04/12/2019	2	A 45	350.00	1.50	525.00	Email response to opposing Attorney re John Hancock documents. ARCH
1718740.00	04/15/2019	1	A 45	375.00	0.20	75.00	Update on settlement discussions. ARCH
1718740.00	04/16/2019	1	A 28	375.00	0.20	75.00	Receipt and review settlement offer and case status. ARCH
1718740.00	04/16/2019	2	A 1	350.00	0.30	105.00	Receipt and review of emails from client's wife. ARCH
1718740.00	04/17/2019	1	A 45	375.00	0.50	187.50	Discuss settlement and review letter to client with Doug. ARCH
1718740.00	04/17/2019	9	A 45	125.00	1.30	162.50	Draft of letter to Clients re: status of case; revisions per MDB; finalize. ARCH
1718740.00	04/22/2019	9	A 45	125.00	1.00	125.00	Begin preparation of initial draft of Defendant Estate's Rule 26 discovery disclosures for review by MDB. ARCH
1718740.00	04/23/2019	2	A 45	350.00	0.50	175.00	Review of rough draft of mandatory disclosures Rule 26. ARCH
1718740.00	04/23/2019	9	A 45	125.00	0.50	62.50	Finalize initial draft of Defendant Estate's Rule 26 discovery disclosures. ARCH
1718740.00	04/24/2019	2	A 45	350.00	1.00	350.00	Telephone call to Herb Janzen regarding extension stipulation; review of Rule 26 disclosures, email paralegal regarding research on duties of impleading party to produce discovery. ARCH
1718740.00	04/24/2019	1	A 45	375.00	0.20	75.00	Rule 11 status, stipulation and ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	04/24/2019	9	A 45	125.00	2.70	337.50	settlement status. Legal research re: discovery issues per MDB; review with MDB.	ARCH
1718740.00	04/29/2019	2	A 45	350.00	1.10	385.00	Research duty of impleaded party to participate in discovery.	ARCH
1718740.00	04/30/2019	2	A 45	350.00	0.50	175.00	Telephone call to attorney Jenzen. Receipt and review of email from client, email to Clay Moore attorney.	ARCH
1718740.00	04/30/2019	1	A 45	375.00	0.30	112.50	Update on discovery and settlement discussions.	ARCH
1718740.00	04/30/2019	2	A 1	350.00	1.10	385.00	Email to Clay Moore re status of settlement, Email to opposing Attorney Berhorst re status of discovery. Research of question of discovery.	ARCH
1718740.00	04/30/2019	2	A 45	350.00	2.50	875.00	Receipt and review of email response from opposing attorney; review of documents produced and discovery and pleadings; email response to opposing attorney re discovery requirement.	ARCH
1718740.00	05/03/2019	2	A 45	350.00	2.80	980.00	email to opposing Attorney re settlement discovery needed. research attorney fee and discovery issues.	ARCH
1718740.00	05/09/2019	2	A 1	350.00	2.00	700.00	Review of discovery status. Prep of draft subpoenas and deposition notices. Email to opposing Attorney re discovery.	ARCH
1718740.00	05/09/2019	9	A 45	125.00	1.00	125.00	Prepare draft of subpoena duces tecum to be served on John Hancock; finalize; email to MDB.	ARCH
1718740.00	05/15/2019	1	A 45	375.00	0.20	75.00	Status update.	ARCH
1718740.00	05/17/2019	9	A 45	125.00	1.00	125.00	Legal research re: venue for deposition of 30(b)(6) corporate witness; review with MDB.	ARCH
1718740.00	05/20/2019	1	A 45	375.00	0.50	187.50	Located documents needed by Doug, forward and print.	ARCH
1718740.00	05/20/2019	9	A 45	125.00	2.50	312.50	Revisions to draft of Rule 26 Initial Disclosures per MDB; finalize; email copy to Janzen for review and comment.	ARCH
1718740.00	05/22/2019	9	A 45	125.00	2.40	300.00	Receipt and review Herb Janzen's proposed Rule 26 Initial Disclosures; call from Janzen re: form of disclosures; revisions to draft of Rule 26 disclosures to incorporate Janzen's requested changes; email to Janzen; call to Janzen to confirm agreement to form; call to MDB to confirm Janzen's approval; prepare summary notebook of communications with Jennifer Berhorst, Attorney and MDB re:	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						discovery issues; review proposed Rule 26 disclosures with MDB; revisions and finalize; prepare letter to be forwarded to opposing counsel.	
1718740.00	05/23/2019	11	A 28	175.00	0.40	70.00	ARCH
						Receipt and review Rule 26 disclosures, attachments and cover letter to counsel.	
1718740.00	05/23/2019	9	A 45	125.00	0.80	100.00	ARCH
						Scan letter to opposing counsel and Rule 26 disclosures; email both to all opposing counsel; copy to MDB, RWG and Janzen; prepare for mailing original copies to all opposing counsel; blind copies to Janzen and Clients.	
1718740.00	05/28/2019	9	A 45	125.00	0.30	37.50	ARCH
						Check PACER service for status of case; receipt and review Order authorizing Spaniol's withdrawal from case; update pleadings notebook.	
1718740.00	05/28/2019	1	A 28	375.00	0.50	187.50	ARCH
						Receipt and review status on discovery requests.	
1718740.00	05/30/2019	2	A 45	350.00	0.30	105.00	ARCH
						Review of the discovery status and lack of response by John Hancock, email to opposing attorney regarding status of production records in response to request for admissions. Email reply and follow up with opposing attorneys paralegal.	
1718740.00	06/04/2019	9	A 45	125.00	0.50	62.50	ARCH
						Begin draft of motion for reconsideration per MDB; update discovery notebook.	
1718740.00	06/04/2019	2	A 45	350.00	1.50	525.00	ARCH
						Draft of order revising prior order. Receipt and review of discovery responses by John Hancock. Draft of reply to opposing Attorney Berhost.	
1718740.00	06/06/2019	1	A 28	375.00	1.00	375.00	ARCH
						Receipt and review discovery responses, issues raised, position of the parties, current status of discovery.	
1718740.00	06/11/2019	2	A 45	350.00	3.50	1,225.00	ARCH
						Review of notice received from court regarding hearing; email to cocounsel in Houston regarding telephone displacing, preparation for telephone hearing on estates motion to dismiss.	
1718740.00	06/11/2019	2	A 45	350.00	1.00	350.00	ARCH
						Preparation for tomorrow's question hearing on the dismissal of wards cross-claim	
1718740.00	06/11/2019	9	A 45	125.00	1.50	187.50	ARCH
						General file review and organization; update pleadings notebook and discovery issues notebook.	
1718740.00	06/12/2019	9	A 45	125.00	0.50	62.50	ARCH
						Check online PACER service for status of case; call from Herb	

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Client ID 1718740.00 Wheatley Estate/Jennifer								
						Janzen re: status of upcoming hearing; update pleadings and discovery notebooks for upcoming hearing.		
1718740.00	06/17/2019	9	A 45	125.00	2.50	312.50	Prepare drafts of additional discovery requests to be served on John Hancock and USA/Department of Justice; revisions per MDB; finalize.	ARCH
1718740.00	06/17/2019	9	A 45	125.00	2.70	337.50	Prepare draft of Motion and Order regarding Rule 12(b)(6) dismissal/abatement issues; revisions per MDB; finalize; prepare draft of letter to opposing counsel re: opposition to entry of proposed Order; email to MDB for review by Janzen and Gabriel; general file review and organization; online search at PACER for status of pending litigation.	ARCH
1718740.00	06/17/2019	2	A 28	350.00	0.20	70.00	Status report to client.	ARCH
1718740.00	06/17/2019	2	A 45	350.00	0.30	105.00	Draft of order and motion to revise prior court order.	ARCH
1718740.00	06/17/2019	2	A 45	350.00		0.00	Continue work on motions to revise prior court order.	ARCH
1718740.00	06/18/2019	1	A 28	375.00	0.50	187.50	Receipt and review discovery and requests for admissions, status of discovery and recent telephone hearing before the Court.	ARCH
1718740.00	06/18/2019	1	A 28	375.00	0.30	112.50	Receipt and review proposed order and motion and comment per Doug's request.	ARCH
1718740.00	06/20/2019	9	A 45	125.00	3.00	375.00	Revisions to drafts of discovery requests to be served on opposing parties; letter to attorneys for John Hancock with copies of discovery requests; copies to attorney for Ward and USA; blind copy to Clients; letter to attorney for USA with copy of discovery requests; copies to attorneys for John Hancock and Ward; blind copy to Client; online search at PACER; update pleadings index and notebook; general file review and filing.	ARCH
1718740.00	06/20/2019	2	A 45	350.00	0.30	105.00	Receipt and review of wards discovery request; forward to client.	ARCH
1718740.00	06/20/2019	2	A 45	350.00	0.20	70.00	Receipt and review of Response of USA attorney.	ARCH
1718740.00	06/21/2019	1	A 28	375.00	0.50	187.50	Receipt and review discovery to H/John Hancock related to change of beneficiary forms.	ARCH
1718740.00	06/21/2019	9	A 45	125.00	3.10	387.50	Receipt and review discovery requests from Ward; prepare	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						discovery notebook; revisions to draft of motion for leave to clarify order and corresponding order; finalize; finalize draft of letter to opposing counsel with copies of documents; email to all attorneys; blind copy to Client.	
1718740.00	06/21/2019	2	A 45	350.00	0.20	70.00	Telephone call to attorney Janzen regarding status of transcript of motion hearing. ARCH
1718740.00	06/24/2019	1	A 28	375.00	0.20	75.00	Receipt and review Status on motions and argument. ARCH
1718740.00	06/24/2019	9	A 45	125.00	1.00	125.00	General case management issues; check online PACER service to update pleadings notebook; follow-up re: request for transcript of 3/14/19 motion hearing. ARCH
1718740.00	06/24/2019	2	A 45	350.00	0.20	70.00	Receipt and review of Notice of non-agency received from USA attorney. ARCH
1718740.00	06/24/2019	2	A 45	350.00	0.20	70.00	Receipt and review of notice of non-agency from John Hancock. ARCH
1718740.00	06/24/2019	2	A 45	350.00	0.10	35.00	Receipt and review of response from attorney Janzen. ARCH
1718740.00	06/24/2019	2	A 45	350.00	0.10	35.00	Receipt and review of response from attorney Moore regarding new position on order. ARCH
1718740.00	06/24/2019	2	A 45	350.00	0.30	105.00	Receipt and review of hearing transcript from court reporter, email to John Hancock attorney regarding position. ARCH
1718740.00	06/25/2019	9	A 45	125.00	1.00	125.00	Receipt and review transcript of March 14, 2019 hearing; review with MDB and discuss response to Judge's ruling. ARCH
1718740.00	06/26/2019	9	A 45	125.00	0.50	62.50	Check PACER records and update pleadings notebook. ARCH
1718740.00	07/01/2019	2	A 45	350.00	0.40	140.00	Receipt and review of Fax from client; email regarding status of case with copies of the USA and John Hancock's admissions of non-agency. ARCH
1718740.00	07/01/2019	2	A 45	350.00	0.40	140.00	Receipt and review of Fax from client; email regarding status of case with copies of the USA and John Hancock's admissions of non-agency. ARCH
1718740.00	07/09/2019	9	A 45	125.00	0.30	37.50	Receipt and review recent Order dismissing Motion to Amend Complaint; online search at PACER for status of case; update pleadings notebook. ARCH
1718740.00	07/22/2019	2	A 28	350.00	0.20	70.00	receipt of email from opposing Attorney re telephone discovery conference tomorrow. Reply email to opposing Attorney re availability. The telephone call to herb Jansen, attorney Receipt and review of emails confirming time of telephone

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	07/23/2019	1	A 28	375.00	0.50	187.50	conference call. Receipt and review of discovery answers from the U.S. attorney's office and cases cited.	ARCH
1718740.00	07/23/2019	2	A 45	350.00	0.20	70.00	Email request to US attorney for copy of complete annuity contract and settlement agreement	ARCH
1718740.00	07/23/2019	2	A 45	350.00	0.30	105.00	Letter to client regarding discovery review.	ARCH
1718740.00	07/24/2019							ARCH
1718740.00	07/24/2019	2	A 45	350.00	0.20	70.00	Ascension point collections Email exchanges regarding proposed order extending discovery	ARCH
1718740.00	07/24/2019	2	A 45	350.00	0.20	70.00	Reply email to John Hancock's attorney regarding understanding of discovery.	ARCH
1718740.00	07/24/2019	2	A 45	350.00	0.20	70.00	Receipt and review of final copy of discovery and extension order	ARCH
1718740.00	07/24/2019	2	A 45	350.00	1.20	420.00	Continued work on summary judgment motion and brief.	ARCH
1718740.00	07/25/2019	2	A 1	350.00	3.50	1,225.00	Begin Research and initial draft of summary judgment motion statement of material facts and review of case cited by US attorney.	ARCH
1718740.00	07/30/2019	9	A 45	125.00	3.50	437.50	Begin preparation of draft of Motion for Summary Judgment for review by MDB.	ARCH
1718740.00	07/30/2019	2	A 45	350.00	0.50	175.00	Work on summary judgment motion	ARCH
1718740.00	07/31/2019	9	A 45	125.00	2.70	337.50	Revisions to draft of Motion for Summary Judgment and related memorandum of law, etc. for review by MDB.	ARCH
1718740.00	07/31/2019	2	A 45	350.00	0.70	245.00	Continue work on motion summary judgment.	ARCH
1718740.00	08/01/2019	1	A 45	375.00	0.50	187.50	Update on discovery, confidentiality agreement, thoughts on summary judgment.	ARCH
1718740.00	08/01/2019	9	A 45	125.00	2.50	312.50	Revisions to draft of Motion for Summary Judgment per MDB.	ARCH
1718740.00	08/01/2019	2	A 45	350.00	0.20	70.00	Now exchange with client regarding scope of regarding scope of protective order.	ARCH
1718740.00	08/01/2019	2	A 45	350.00	0.20	70.00	Email to opposing attorney regarding agreement to protective order	ARCH
1718740.00	08/01/2019	2	A 45	350.00	0.50	175.00	Continue work on summary judgment motion brief.	ARCH
1718740.00	08/02/2019	9	A 45	125.00	1.50	187.50	Revisions to draft of Motion for Summary Judgment per MDB.	ARCH
1718740.00	08/05/2019	9	A 45	125.00	1.00	125.00	Receipt and review recent discovery responses from John Hancock; online search at Pacer service for status of court filings; update pleadings and discovery notebooks per MDB.	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	08/05/2019	2 A 45	350.00	1.00	350.00	Further revisions to motion and memorandum of law	ARCH
1718740.00	08/06/2019	2 A 24	350.00	2.50	875.00	Work on motions to revise prior orders,	ARCH
1718740.00	08/06/2019	9 A 45	125.00	1.60	200.00	Revisions to draft of Motion for Summary Judgment for review by MDB.	ARCH
1718740.00	08/07/2019	2 A 24	350.00	1.50	525.00	continued work on summary judgment brief and rule 54 motions.	ARCH
1718740.00	08/07/2019	9 A 45	125.00	1.70	212.50	Revisions to draft of Motion for Summary Judgment per MDB; prepare draft of Order granting motion for summary judgment for review by MDB; prepare draft of Motion to Revise Order per MDB; prepare draft of Order granting motion to review order.	ARCH
1718740.00	08/08/2019	9 A 45	125.00	0.50	62.50	Revisions to drafts of Motion to Revise Order and Order; email to MDB.	ARCH
1718740.00	08/08/2019	1 A 28	375.00	1.00	375.00	Receipt and review answers to discovery.	ARCH
1718740.00	08/12/2019	9 A 45	125.00	1.80	225.00	Revisions to drafts of Motion for Summary Judgment and both Motions to Revise Order per MDB.	ARCH
1718740.00	08/13/2019	1 A 28	375.00	0.70	262.50	Receipt and review of motions and orders regarding summary judgment.	ARCH
1718740.00	08/13/2019	2 A 45	350.00	0.30	105.00	Telephone conference with Houston atty	ARCH
1718740.00	08/26/2019	1 A 28	375.00	0.30	112.50	Receipt and review of motion to intervene filed by Hall.	ARCH
1718740.00	08/26/2019	2 A 45	350.00	1.50	525.00	Work on summary judgment motion.	ARCH
1718740.00	08/27/2019	2 A 45	350.00	3.00	1,050.00	Finalization of SJ motion.	ARCH
1718740.00	08/28/2019	2 A 1	350.00	2.50	875.00	Edits to brief and draft of appendix	ARCH
1718740.00	09/03/2019	1 A 24	375.00	0.50	187.50	Office conference with Doug re order of the court regarding summary judgment and motions to dismiss.	ARCH
1718740.00	09/04/2019	1 A 28	375.00	0.30	112.50	Receipt and review status of pending motions. Hearing date.	ARCH
1718740.00	09/06/2019	1 A 28	375.00	0.50	187.50	Receipt and review of SJ motion, update on hearing status, discussions among counsel.	ARCH
1718740.00	09/09/2019	1 A 28	375.00	0.50	187.50	Receipt and review of Summary judgment motion and proposed order filed with the Clerk.	ARCH
1718740.00	09/10/2019	2 A 45	350.00	2.50	875.00	Finalization of motion to revise prior order, review of bad faith issue and grounds for making a claim.	ARCH
1718740.00	09/13/2019	2 A 45	350.00	0.20	70.00	Receipt and review of email from client. Reply email.	ARCH
1718740.00	09/14/2019	2 A 45	350.00	3.00	1,050.00	Work on motions.	ARCH
1718740.00	09/16/2019	1 A 28	375.00	0.50	187.50	Receipt and review of analysis of pending motions, claims for attorney	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer						
					fees and costs, missing annuity payments, claims for the interpleader funds.	
1718740.00	09/17/2019	1 A 28	375.00	0.50	187.50	Receipt and review of Doug's summary of current status of motions, attorney fees and costs. ARCH
1718740.00	09/24/2019	2 A 45	350.00	0.30	105.00	Telephone conference with Herb re filing motion. ARCH
1718740.00	09/24/2019	2 A 1	350.00	3.00	1,050.00	Work on affidavit in opposition to Hancock's motion for attorneys fees. ARCH
1718740.00	10/02/2019	1 A 28	375.00	0.50	187.50	Receipt and review Summary Judgment filings. ARCH
1718740.00	10/03/2019	1 A 28	375.00	0.30	112.50	Receipt and review summary judgment materials. ARCH
1718740.00	10/05/2019	2 A 45	350.00	0.80	280.00	Resume work on response in opposition to attorney fee motion for John Hancock. ARCH
1718740.00	10/05/2019	2 A 45	350.00	1.20	420.00	Work on response in opposition to John Hancock's atty fee motion. ARCH
1718740.00	10/05/2019	6 A 45	125.00	0.70	87.50	Resume work on response in opposition to attorney fee motion for John Hancock. ARCH
1718740.00	10/05/2019	6 A 45	125.00	1.20	150.00	Work on response in opposition to John Hancock's atty fee motion. ARCH
1718740.00	10/06/2019	2 A 1	350.00	1.85	647.50	Finalize reply in response to SJ motion. ARCH
1718740.00	10/06/2019	2 A 45	350.00	1.50	525.00	Work on response to JH Motion for attorneys fees. ARCH
1718740.00	10/08/2019	6 A 45	125.00	1.85	231.25	Finalize reply in response to SJ motion. ARCH
1718740.00	10/06/2019	6 A 45	125.00	1.50	187.50	Work on response to JH Motion for attorneys fees. ARCH
1718740.00	10/07/2019	2 A 45	350.00	1.75	612.50	Work on response to JH motion for attorney's fees. ARCH
1718740.00	10/07/2019	6 A 45	125.00	1.75	218.75	Work on response to JH motion for attorney's fees. ARCH
1718740.00	10/08/2019	2 A 45	350.00	2.00	700.00	Work on response to JH motion for attorney's fees. ARCH
1718740.00	10/08/2019	6 A 45	125.00	2.00	250.00	Work on response to JH motion for attorney's fees. ARCH
1718740.00	10/09/2019	2 A 45	350.00	1.25	437.50	Final edits and organization for filing. ARCH
1718740.00	10/09/2019	6 A 45	125.00	1.25	156.25	Final edits and organization for filing. ARCH
1718740.00	10/17/2019	2 A 1	350.00	2.00	700.00	Reply to JH response to motion to revise 3/14/2019 order. ARCH
1718740.00	10/17/2019	1 A 28	375.00	0.50	187.50	Receipt and review filings, updates, court orders and motion hearings. ARCH
1718740.00	10/17/2019	6 A 45	125.00	2.00	250.00	Reply to JH response to motion to revise 3/14/2019 order. ARCH
1718740.00	10/18/2019	2 A 45	350.00	2.00	700.00	Finalization of reply to JH's opposition to rule 54 (b) motion. ARCH
1718740.00	10/18/2019	2 A 1	350.00	4.25	1,487.50	Receipt and review of ward's motion and opposition to JH's atty fee motion. work on finalizing ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						opposition to JH opposition to rule 54(b) motions.	
1718740.00	10/18/2019	6 A 45	125.00	2.00	250.00	Finalization of reply to JH's opposition to rule 54 (b) motion.	ARCH
1718740.00	10/18/2019	6 A 45	125.00	4.25	531.25	Receipt and review of ward's motion and opposition to JH's atty fee motion. work on finalizing opposition to JH opposition to rule 54(b) motions.	ARCH
1718740.00	10/21/2019	6 A 45	125.00	0.50	62.50	Receipt and review of status of the case and its posture.	ARCH
						Preparing letter and enclosures to [redacted]	
1718740.00	10/22/2019	6 A 45	125.00	0.50	62.50	Telephone call with [redacted]	ARCH
1718740.00	10/24/2019	6 A 45	125.00	0.50	62.50	Review of [redacted]	ARCH
1718740.00	10/29/2019	6 A 45	125.00	0.50	62.50	Receipt and review of status of the case and its posture.	ARCH
1718740.00	10/29/2019	1 A 28	375.00	0.30	112.50	Receipt and review of status of the case and its posture.	ARCH
1718740.00	10/30/2019	2 A 45	350.00	0.70	245.00	update of Arrears calculation, email to opposing attorney regarding same.	ARCH
1718740.00	11/04/2019	6 A 45	125.00	0.20	31.25	Receipt and review of status of the case and its posture.	ARCH
1718740.00	11/06/2019	8 A 45	175.00	0.20	35.00	Receipt of instructions from Douglas Berry, Esquire; review file; notify Douglas Berry, Esquire of court deadline for Response to Motion	ARCH
1718740.00	11/06/2019	8 A 45	175.00	0.20	35.00	Email communication to Douglas Berry, Esquire enclosing Motion for review	ARCH
1718740.00	11/11/2019	2 A 45	350.00	0.20	70.00	Email exchange with opposing Attorney regarding sick JH employee and excel summary of interpleader shortfall.	ARCH
1718740.00	11/13/2019	2 A 45	350.00	0.50	175.00	Receipt and review of Response to motion to revise order entered on July 3, 2019.	ARCH
1718740.00	11/13/2019	8 A 45	175.00	0.20	35.00	Email communication with Douglas Berry, Esquire regarding Witness List matters	ARCH
1718740.00	11/13/2019	1 A 45	375.00	0.50	187.50	Status on proceedings, hearing on the merits.	ARCH
1718740.00	11/13/2019	2 A 28	350.00	3.20	1,120.00	Receipt and review of Response brief filed by John Hancock; begin draft on reply. Receipt and review of memorandum and order from judge, email to client.	ARCH
1718740.00	11/13/2019	6 A 45	125.00	0.20	31.25	Review of [redacted]	ARCH
1718740.00	11/13/2019	1 A 28	375.00	0.50	187.50	Receipt and review of Judge Ellison's order. Brief discussion with Doug.	ARCH
1718740.00	11/15/2019	2 A 45	350.00	2.50	875.00	Review of John Hancock response, initial outline of reply. Receipt and review of judgment by court, email	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						to client, telephone conference with opposing attorney regarding settlement.	
1718740.00	11/15/2019	8	A 45	175.00	0.40	70.00 Update client's pleading notebook for upcoming case events	ARCH
1718740.00	11/18/2019	1	A 45	175.00	0.40	70.00 Update client's pleading notebook for upcoming case events	ARCH
1718740.00	11/18/2019	8	A 45	175.00	0.20	35.00 Continue to update pleadings notebook with essential pleadings for upcoming case events	ARCH
1718740.00	11/19/2019	2	A 45	350.00	0.30	105.00 Email to opposing attorney regarding estates response regarding settlement position	ARCH
1718740.00	11/19/2019	2	A 45	350.00	1.10	385.00 conference calls with Herb Janzen and the Wheatley's re posture of case and settlement options.	ARCH
1718740.00	11/20/2019	8	A 45	175.00	0.20	35.00 Prepare MDB and file for telephone conference with client regarding recently entered Memorandum and Order	ARCH
1718740.00	11/20/2019	1	A 45	375.00	0.70	262.50 Conference all with Herb and with Mr. and Mrs. Wheatley to discuss posture of the case and potential settlement.	ARCH
1718740.00	11/25/2019	1	A 45	375.00	0.20	75.00 Update on status of pending claims, discovery and trial settings for those claims.	ARCH
1718740.00	11/25/2019	2	A 45	350.00	0.50	175.00 Email exchange with opposing attorneys regarding trial date, email to trial court administrator regarding trial date	ARCH
1718740.00	11/25/2019	2	A 45	350.00	1.50	525.00 Draft of settlement proposal.	ARCH
1718740.00	11/26/2019	8	A 45	175.00	0.40	70.00 Receipt of instructions from MBD; create Excel spreadsheet involving annuity payments and interest	ARCH
1718740.00	11/27/2019	8	A 45	175.00	0.40	70.00 Receipt of instructions from MBD; continue to adjust graph related to annuity interest	ARCH
1718740.00	12/02/2019	8	A 45	175.00	1.00	175.00 Office meeting with MBD; discuss and make multiple edits to interest baring chart	ARCH
1718740.00	12/03/2019	1	A 45	375.00	0.50	187.50 Updates regarding conference call today; motions and causes of action pending for counter claims, cross claims, attorney fees and costs.	ARCH
1718740.00	12/03/2019	8	A 45	175.00	0.20	35.00 Telephone conference with Herbert Janzen regarding last minute Status Conference; text communication to MBD regarding same	ARCH
1718740.00	12/03/2019	8	A 45	175.00	0.20	35.00 Continue to update notebook with essential pleadings for upcoming case events	ARCH
1718740.00	12/03/2019	2	A 45	350.00	1.80	630.00 Receipt and review of Notice from court status conference hearing this	ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	12/03/2019	2 A	1	350.00	1.80	630.00	ARCH
							morning, receipt and review of email response to client regarding questions pertaining to offer of settlement,, answer to questions sent to client; finalization of settlement offers, settlement offer sent to opposing attorney.
1718740.00	12/03/2019	2 A	1	350.00	1.80	630.00	ARCH
							Telephone status conference with judge and opposing attorney, research trial damage issue and law, telephone conversation with attorney Jensen regarding Texas case.
1718740.00	12/04/2019	8 A	45	175.00	0.40	70.00	ARCH
							Receipt of instructions from MDB; mark up Answer, Claims and Counterclaims against Plaintiff's Answer to Defendant's Counterclaims
1718740.00	12/05/2019	1 A	28	375.00	0.50	187.50	ARCH
							Receipt and review of status on pending motions, new trial date, settlement discussions.
1718740.00	12/06/2019	1 A	45	175.00	0.20	35.00	ARCH
							Receipt of instructions from MDB; review file; draft Motion for Leave to Amend
1718740.00	12/09/2019	8 A	45	175.00	0.20	35.00	ARCH
							Receipt of instructions from MDB regarding Request for Admissions; review file
1718740.00	12/09/2019	2 A	45	350.00	0.20	70.00	ARCH
							Receipt and review of email from Ms. Wheatley re damages.
1718740.00	12/09/2019	8 A	45	175.00	0.40	70.00	ARCH
							Receipt of instructions from MDB; review file; draft Motion for Leave to Amend
1718740.00	12/10/2019	8 A	45	175.00	0.40	70.00	ARCH
							Receipt of instructions from MDB; review file; draft Request for Admissions
1718740.00	12/10/2019	8 A	45	175.00	0.20	35.00	ARCH
							Draft proposed Order Granting Motion for Leave to Amend
1718740.00	12/10/2019	8 A	45	175.00	0.60	105.00	ARCH
							Receipt and review of email communication from MDB with detailed instructions; multiple revisions to the Motion for Leave to Amend
1718740.00	12/11/2019	2 A	45	350.00	2.00	700.00	ARCH
							Research case law dealing with bad-faith and punitive damages in Texas, review of motion to amend to add fifth counterclaim.
1718740.00	12/11/2019	8 A	45	175.00	0.20	35.00	ARCH
							Assist with Texas Insurance Code information for file purposes
1718740.00	12/12/2019	2 A	45	350.00	2.40	840.00	ARCH
							Revisions to motion to amend and discovery
1718740.00	12/13/2019	2 A	45	350.00	2.50	875.00	ARCH
							Motion to amend to add fifth counterclaim.
1718740.00	12/13/2019	8 A	45	175.00	1.00	175.00	ARCH
							Additional edits to Motion for Leave to Amend; discussions with MDB
1718740.00	12/13/2019	8 A	45	175.00	0.60	105.00	ARCH
							Additional edits to Third Request for

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						Admissions; add Second Set of Interrogatories to same pleading	
1718740.00	12/16/2019	2	A 1	350.00	0.10	35.00	ARCH
1718740.00	12/17/2019	2	A 45	350.00	2.00	700.00	ARCH
						Research question of "knowingly"	
						Research of common law bad faith claims in Texas.	
1718740.00	12/17/2019	8	A 45	175.00	0.60	105.00	ARCH
						Continue to make edits to the Motion for Leave to Amend	
1718740.00	12/17/2019	8	A 45	175.00	0.30	52.50	ARCH
						Assist with Texas Civil Practice and Remedy Code information for file purposes	
1718740.00	12/20/2019	8	A 45	175.00	0.50	87.50	ARCH
						Assist in calculating interest figures; assist with Georgia Statute matters	
1718740.00	12/23/2019	8	A 45	175.00	0.30	52.50	ARCH
						Assist with Georgia bad faith matters, Texas Insurance codes and Massachusetts bad faith matters	
1718740.00	12/26/2019	2	A 1	350.00	1.80	630.00	ARCH
						Receipt and review of emails from client. Response to client.	
1718740.00	12/27/2019	8	A 45	175.00	0.60	105.00	ARCH
						Receipt of email communication from MDB with instructions to research the Secretary of State websites for Georgia, Texas, North Carolina and Massachusetts regarding John Hancock; online research; email communication with Secretary of State for Texas; communication with MDB regarding end results of said research	
1718740.00	12/27/2019	8	A 45	175.00	0.20	35.00	ARCH
1718740.00	12/29/2019	2	A 1	350.00		0.00	ARCH
						Assist with Massachusetts statutes Work on conflict of laws issue and MAAss remedies.	
1718740.00	12/30/2019	2	A 1	350.00	3.40	1,190.00	ARCH
						Additional research re choice of law and amendment.	
1718740.00	12/30/2019	8	A 45	175.00	0.40	70.00	ARCH
						Continue to revise and edit Motion for Leave to Amend	
1718740.00	12/30/2019	8	A 45	175.00	1.00	175.00	ARCH
1718740.00	12/31/2019	1	A 28	375.00	0.40	150.00	ARCH
						Begin to draft Memorandum of Law Receipt and review of present value computations and thoughts on settlement.	
1718740.00	01/02/2020	8	A 45	175.00	0.50	87.50	ARCH
						Additional edits to Motion for Leave to Amend	
1718740.00	01/02/2020	8	A 45	175.00	1.00	175.00	ARCH
						Continue to draft and revise Memorandum of Law	
1718740.00	01/03/2020	2	A 45	350.00	0.40	140.00	ARCH
						Receipt and review of email from client regarding settlement, response email regarding counteroffer.	
1718740.00	01/03/2020	8	A 45	175.00	0.40	70.00	ARCH
						Additional edits to Motion for Leave to Amend	
1718740.00	01/06/2020	1	A 28	375.00	0.30	112.50	ARCH
						Receipt and review of status of settlement memo from Doug.	
1718740.00	01/08/2020	1	A 45	375.00	1.00	375.00	ARCH
						On line research of John Hancock Annuity forms. Search for effective dates, forms manual, consider liquidated damages stemming from	

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Client ID 1718740.00 Wheatley Estate/Jennifer							
						contract provisions and sum certain due.. Print annuity forms in use since 11/17,	
1718740.00	01/07/2020	8	A 45	175.00	1.00	175.00	Continue to draft and revise Memorandum of Law ARCH
1718740.00	01/07/2020	8	A 45	175.00	0.30	52.50	Continue to draft and revise Memorandum of Law ARCH
1718740.00	01/08/2020	8	A 45	175.00	0.40	70.00	Continue to draft and revise Motion for Leave to Amend ARCH
1718740.00	01/08/2020	2	A 1	350.00	1.50	525.00	Revision to motions to amend and memorandum in support thereof ARCH
1718740.00	01/08/2020	8	A 45	175.00	2.00	350.00	Continue to revise (at length) Memorandum of Law, Motion for Leave to Amend and proposed Order ARCH
1718740.00	01/09/2020	2	A 1	350.00	4.00	1,400.00	Memorandum and further research of cases re: MA law. ARCH
1718740.00	01/09/2020	8	A 45	175.00	0.50	87.50	Continue to edit Memorandum of Law ARCH
1718740.00	01/10/2020	8	A 45	175.00	1.00	175.00	Continue to edit and finalize the Memorandum of Law and Motion for Leave to Amend; email communication to Herbert Janzen ARCH
1718740.00	01/13/2020	2	A 1	350.00	1.90	665.00	Receipt and review of notice of appeal. Research interlocutory appeal issue. ARCH
1718740.00	01/13/2020	8	A 1	175.00	0.20	35.00	Continue to update pleadings binder for upcoming case events ARCH
1718740.00	01/13/2020	8	A 1	175.00	0.30	52.50	Online research for Texas Appeal Rules; create notebook related to same for MDB ARCH
1718740.00	01/14/2020	2	A 1	350.00	0.30	105.00	Telephone conference with Herb re status of appeal. Review of Judges' order. ARCH
1718740.00	01/14/2020	8	A 1	175.00	0.20	35.00	Receipt and review of email communication from Herbert Janzen enclosing Appeal information; continue to create notebook related to same for MDB ARCH
1718740.00	01/14/2020	1	A 28	375.00	1.00	375.00	Receipt and review of rule of procedure and case law on interlocutory appeal, respond to memo from Doug and to Herb. ARCH
1718740.00	01/15/2020	2	A 28	90.00	0.10	9.00	Receipt and review of attorney Gabriel's response. ARCH
1718740.00	01/15/2020	2	A 1	350.00	4.00	1,400.00	Research issue of "prior demand" requirement under Mass law. Work on memorandum re choice of law. ARCH
1718740.00	01/15/2020	8	A 1	175.00	2.00	350.00	Begin to work on Memorandum of Law to Support Motion to Determine Choice of Law ARCH
1718740.00	01/16/2020	2	A 1	350.00	1.00	350.00	Email exchange with rwg re fee agreement. ARCH
1718740.00	01/16/2020	1	A 24	375.00	0.50	187.50	Office conference with Doug to discuss mediation/settlement/trial ARCH

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Client ID 1718740.00 Wheatley Estate/Jennifer								
1718740.00	01/16/2020	2	A	45	350.00	2.40	840.00	strategy. Work on memorandum regarding choice of law ARCH
1718740.00	01/16/2020	8	A	45	175.00	1.50	262.50	Continue to work on Motion and Memorandum in Support to Determine Choice of Law ARCH
1718740.00	01/17/2020	8	A	45	175.00	1.00	175.00	Continue to work on Motion and Memorandum of Law in Support of Determination of Choice Law ARCH
1718740.00	01/20/2020	2	A	45	350.00	0.30	105.00	Telephone conference with Herb Jansen re settlement, mediation and trial logistics. ARCH
1718740.00	01/21/2020	2	A	45	350.00	2.00	700.00	Work on redraft of follow-up discovery requests for admissions interrogatories and request for documents will ARCH
1718740.00	01/21/2020	8	A	45	175.00	1.50	262.50	Receipt of email communication from MDB; continue to edit Request for Admissions, Interrogatories and Request to Produce pleading ARCH
1718740.00	01/22/2020	2	A	45	350.00	1.50	525.00	Finish draft of discovery; draft of attachment to subpoena. ARCH
1718740.00	01/22/2020	2	A	45	350.00	0.80	280.00	Final revisions to memorandum regarding choice of law ARCH
1718740.00	01/22/2020	1	A	45	375.00	0.20	75.00	Status of settlement, counter offers and discovery needed. ARCH
1718740.00	01/22/2020	8	A	45	175.00	0.30	52.50	Continue to edit Request for Admissions, Interrogatories and Request to Produce pleading ARCH
1718740.00	01/22/2020	8	A	45	175.00	0.40	70.00	Continue to edit Motion and Memorandum of Law to Support of Determination of Choice of Law ARCH
1718740.00	01/22/2020	8	A	45	175.00	0.50	87.50	Receipt of email communication from MDB; draft Notice of Taking Deposition Duces Tecum; draft Subpoena duces tecum ; draft attachment list of documents for subpoena ARCH
1718740.00	01/22/2020	8	A	45	175.00	0.20	35.00	Continue to edit Notice of Taking Deposition ARCH
1718740.00	01/23/2020	8	A	45	175.00	0.60	105.00	Continue to edit Motion and Memorandum of Law to Support for Determination of Choice Law ARCH
1718740.00	01/23/2020	8	A	45	175.00	0.30	52.50	Continue to edit Notice of Taking Deposition and attachment ARCH
1718740.00	01/23/2020	2	A	45	350.00	2.50	875.00	Review the issue of final order, appeal status and discovery to be sent. ARCH
1718740.00	01/23/2020	2	A	45	350.00	0.10	35.00	Review of contingent fee contract with client. Review of discovery and email. Finalize email to opposing Attorney . ARCH
1718740.00	01/24/2020	1	A	45	375.00	0.20	75.00	Review client notes to prepare for telephone conference. ARCH
1718740.00	01/24/2020	44	A	45	175.00	0.20	28.75	Conference with PWG ARCH

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1718740.00	01/24/2020	8	A 45	175.00	0.60	105.00	Continue to edit Third Request for Admissions, Interrogatories and Request to Produce ARCH
1718740.00	01/27/2020	2	A 45	350.00	0.20	70.00	Print out 4 cases re interlocutory order. ARCH
1718740.00	01/27/2020	2	A 45	350.00	1.70	595.00	Review and revisions to Motion re choice of law. ARCH
1718740.00	01/27/2020	8	A 45	175.00	0.30	52.50	Continue to edit Third Request for Admissions, Interrogatories and Request to Produce ARCH
1718740.00	01/27/2020	8	A 45	175.00	0.30	52.50	Continue to edit Motion and Memorandum of Law in Support of Determination of Choice of Law ARCH
1718740.00	01/27/2020	8	A 45	175.00	0.30	52.50	Continue to update pleadings notebook for MDB in preparation of upcoming case events ARCH
1718740.00	01/27/2020	8	A 45	175.00	0.20	35.00	Edit letter to all counsel enclosing discovery and Notice of Taking Deposition with instructions ARCH
1718740.00	01/28/2020	2	A 45	350.00	1.20	420.00	Work on memorandum regarding choice of law. ARCH
1718740.00	01/28/2020	8	A 45	175.00	0.20	35.00	Continue to edit Motion and Memorandum of Law in Support of Determination of Choice of Law ARCH
1718740.00	01/29/2020	8	A 45	175.00	0.60	105.00	Continue to revise and edit Motion and Memorandum of Law in Support of Determination of Choice of Law ARCH
1718740.00	01/30/2020	2	A 45	350.00	2.70	945.00	Proofing revisions of memorandum regarding choice of law. ARCH
1718740.00	01/30/2020	8	A 45	175.00	0.30	52.50	Continue to edit Motion and Memorandum of Law in Support of Determination of Choice of Law ARCH
1718740.00	02/02/2020	2	P 45	350.00	3.90	0.00	Research amendment issue. Preparation of Reply to John Hancock's opposition of repsonse 536
1718740.00	02/06/2020	8	P 45	175.00	1.20	0.00	Continue to edit Response to Plaintiff's Opposition for Motion for Leave of Court 537
1718740.00	02/07/2020	8	P 45	175.00	0.80	0.00	Continue to edit Response to Plaintiff's Opposition for Motion for Leave of Court 539
1718740.00	02/07/2020	8	P 45	175.00	0.50	0.00	Edit Motion to Modify Scheduling Order 540
1718740.00	02/07/2020	8	P 45	175.00	0.30	0.00	Continue to edit Motion and Memorandum in Support of Determination of Choice Law 541
1718740.00	02/09/2020	2	P 45	350.00	3.00	0.00	Review and additional research regarding memorandum reply to motion regarding choice of law. 548
1718740.00	02/10/2020	8	P 45	175.00	0.30	0.00	Continue to edit Motion to 543
1718740.00	02/10/2020	8	P 45	175.00	0.30	0.00	Edit Order Granting Motion to Support Determination of Choice of Law 544
1718740.00	02/10/2020	8	P 45	175.00	0.40	0.00	Continue to edit Motion to Modify Scheduling Order 545

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1718740.00	02/10/2020	8	P 45	175.00	0.60	0.00 Continue to edit Motion and Memorandum of Law to Support for Determination of Choice of Law	546
1718740.00	02/10/2020	8	P 45	175.00	1.00	0.00 Continue to edit Response to Plaintiff's Opposition to Motion for Leave to Amend	547
1718740.00	02/11/2020	8	P 45	175.00	0.20	0.00 Telephone conference with Karen at [REDACTED]	549
1718740.00	02/11/2020	8	P 45	175.00	0.20	0.00 Continue to update pleadings notebook for upcoming case events for MDB review and preparation	550
1718740.00	02/11/2020	8	P 45	175.00	0.50	0.00 Receipt of instructions from MDB; review appeal docket; create appeal pleadings notebook for MDB review and preparation for upcoming case events	551
1718740.00	02/11/2020	8	P 45	175.00	0.40	0.00 Receipt of instructions from MDB; telephone conference with Fifth Circuit Court of Appeals regarding Notice of Appearance and issues with same; draft detailed email communication to MDB regarding outcome of telephone conference and issues with same	552
1718740.00	02/14/2020	2	P 45		0.40	0.00 Receipt and review of Offer of judgment and response in opposition to motion to amend.	599
1718740.00	02/17/2020	2	P 45		0.20	0.00 Letter to client regarding mediation, and offer of judgement.	600
1718740.00	02/18/2020	2	P 45		0.60	0.00 Receipt and review of correspondence from client re Mediation telephone conference call this afternoon and settlement position; reply email to client regarding these details.	601
1718740.00	02/18/2020	2	P 3		0.40	0.00 Telephone conference With attorney Jenzen regarding mediation session this afternoon.	602
1718740.00	02/24/2020	8	P 45		0.20	0.00 Continue to update pleadings notebook for upcoming case events for MDB review and preparation	603
1718740.00	02/25/2020	2	P 45		2.00	0.00 Receipt and review of motion for protective order, draft of response.	604
1718740.00	02/26/2020	8	P 45		0.30	0.00 Continue to update Appeal file notebook for MDB review and preparation for upcoming case events	605
1718740.00	02/26/2020	8	P 45		0.40	0.00 Receipt of email communication from MDB; begin to edit Response in Opposition of John Hancock's Motion for Protective Order	606
1718740.00	02/28/2020	2	P 45		0.40	0.00 Receipt and review of misc. court notices.	607
1718740.00	02/28/2020	8	P 45		0.20	0.00 Continue to update pleadings binder for MDB review and preparation for	608

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	03/04/2020	2	P 45		5.00	0.00	609
						upcoming case events	
1718740.00	03/05/2020	8	P 45		1.00	0.00	610
						Initial draft of Motion of partial summary judgement.	
1718740.00	03/05/2020	8	P 45		1.00	0.00	612
						Continue to work on and edit Motion to Modify Scheduling Order	
1718740.00	03/06/2020	8	P 45		1.00	0.00	611
						Continue to work on and edit Response to Opposition of John Hancock's Motion for Protective Order	
1718740.00	03/08/2020	8	P 45		0.20	0.00	615
						Continue to work on, edit and finalize Motion to Modify Scheduling Order	
1718740.00	03/08/2020	2	P 45		2.40	0.00	613
						Edit Notice of Appearance in Appeal matter	
1718740.00	03/09/2020	2	P 45		0.10	0.00	614
						Receipt and review of email from client regarding schedule and mediation preference. Reply email to client. Work on response to motion for protective order.	
1718740.00	03/09/2020	8	P 45		0.20	0.00	616
						Receipt and review of Fifth Circuit Court of Appeals notice of appearance.	
1718740.00	03/09/2020	8	P 45		0.20	0.00	617
						Continue to update pleadings binder for upcoming case events for MDB review	
1718740.00	03/09/2020	8	P 45		1.50	0.00	618
						Continue to update pleading binder (APPEAL) for case matter and for MDB review	
1718740.00	03/10/2020	8	P 45		0.20	0.00	619
						Receipt of detailed email communication from MDB; continue to edit Response to Opposition Motion from John Hancock on Motion for Protective Order	
1718740.00	03/10/2020	8	P 45		1.50	0.00	620
						Email communications with Christina Gardner, Case Management Clerk, for the Fifth Circuit of Appeals regarding issues with the Notice of Appearance	
1718740.00	03/10/2020	8	P 45		0.40	0.00	621
						Receipt of email communications from MDB with instructions; continue to edit our Response to Opposition from John Hancock's Motion for Protective Order	
1718740.00	03/11/2020	8	P 45		2.00	0.00	622
						Receipt of email communication from MDB with instructions; begin to work on timeline graph	
1718740.00	03/11/2020	8	P 45		0.40	0.00	623
						Continue to edit our Response to Opposition from John Hancock's Motion for Protective Order	
1718740.00	03/12/2020	8	P 45		2.00	0.00	624
						Continue to work on Timeline for MDB	
						Continue to edit and finalize our Response in Opposition to John Hancock's Motion for Protective Order	

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Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	03/15/2020	2	P 45		4.10	0.00 Final edits to motion for partial summary judgment.	625
1718740.00	03/15/2020	2	P 45		3.40	0.00 Final motion for partial summary judgment.	626
1718740.00	03/16/2020	2	P 45		3.50	0.00 Work on revisions to motion for partial summary judgment and filing thereof.	627
1718740.00	03/16/2020	8	P 45		2.00	0.00 Edit and finalize Motion for Partial Summary Judgment Against John Hancock	629
1718740.00	03/17/2020	2	P 45		2.50	0.00 finalization of reply to motion regarding choice of law.	628
1718740.00	03/17/2020	8	P 45		1.00	0.00 Edit and finalize Reply to John Hancock's Opposition to Motion and Memorandum in Support for Determination of Choice of Law	630
1718740.00	03/17/2020	8	P 45		0.20	0.00 Continue to update pleadings notebook for file and MDB review for upcoming case events	631
1718740.00	03/24/2020	2	P 28		0.50	0.00 Receipt and review of email from client. Reply email.	632
1718740.00	03/26/2020	8	P 45		0.40	0.00 Continue to update Massachusetts case law Binder with updated case law; edit Table of Contents	633
1718740.00	03/27/2020	2	P 28		0.80	0.00 Receipt and initial review of response in opposition to motion to modify scheduling order.	634
1718740.00	03/27/2020	8	P 45		0.20	0.00 Continue to update pleading binder (new pleadings) for MDB review and upcoming case events	635
1718740.00	03/27/2020	8	P 45		0.20	0.00 Receipt and review of email communication from client regarding John Hancock's recently filed Response; respond to same answering their questions	636
1718740.00	03/30/2020	8	P 45		1.50	0.00 Edit and finalize Reply to John Hancock's Response in Opposition to Wheatley Estate's Motion to Modify Scheduling Order	637
1718740.00	03/31/2020	8	P 45		0.20	0.00 Continue to update pleadings binder for MDB review and preparation for upcoming case events	638
1718740.00	04/06/2020	2	P 28		0.50	0.00 Receipt and review of JH's response to motion for partial summary judgment.	641
1718740.00	04/06/2020	2	P 28		0.80	0.00 Receipt and review of memorandum reply to John Hancock's opposition to motion for partial summary judgment.	639
1718740.00	04/09/2020	2	P 28		1.50	0.00 Work on reply to partial summary judgment motion. Email to client.	640
1718740.00	04/13/2020	2	P 28		2.50	0.00 Revision to reply.	642
1718740.00	04/23/2020	2	P 45		0.20	0.00 Receipt of record of certified appeal.	664
1718740.00	04/30/2020	2	P 45		0.20	0.00 Receipt and review of Order of Court of Appeals.	665

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Client ID 1718740.00 Wheatley Estate/Jennifer						
1718740.00	05/02/2020	2 P 45	350.00	0.40	140.00 Telephone conference with with opposing Attorney re joint communication with court. Receipt and review of email from opposing Attorney of email, email approval.	652
1718740.00	05/02/2020	2 P 45	350.00	0.20	70.00 Receipt and review of notice of representation from Mabry.	653
1718740.00	05/11/2020	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	643
1718740.00	05/11/2020	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	644
1718740.00	05/13/2020	1 P 28		1.00	0.00 Receipt and review several memos and updates regarding case status, pending motions, settlement overtures.	645
1718740.00	05/13/2020	2 P 45		0.40	0.00 Telephone conference with opposing Attorney re status.	648
1718740.00	05/14/2020	1 P 28		0.50	0.00 Receipt and review update on settlement offers and discussions.	646
1718740.00	05/14/2020	2 P 45		0.70	0.00 Receipt and review of offer of settlement from opposing Attorney, forwarding to client with analysis.	647
1718740.00	05/15/2020	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	649
1718740.00	05/18/2020	1 P 45		0.20	0.00 Update on recent settlement and trial date activities.	650
1718740.00	05/20/2020	2 P 45		0.30	0.00 Receipt and review of email from court re trial readiness, email to opposing Attorney re telephone conference tomorrow. Reply confirmation.	651
1718740.00	05/26/2020	1 P 28		0.50	0.00 Receipt and review recent order denying fifth motion to amend.	654
1718740.00	05/26/2020	2 P 45		2.00	0.00 Receipt and review of court ruling, email to clients. Receipt and review of court notice of hearing, email to client.	655
1718740.00	05/26/2020	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	656
1718740.00	05/27/2020	2 P 45		0.70	0.00 Review of judges order, email to client concerning next steps. Draft of discovery conference letter to opposing Attorney.	657
1718740.00	05/28/2020	1 P 45		1.00	0.00 Prepare for and participate in conference call with clients regarding settlement possibilities and pending hearing today.	658
1718740.00	05/28/2020	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	659
1718740.00	05/28/2020	2 P 45		2.00	0.00 Motion hearing on partial summary judgement Motion, and other matters.	666
1718740.00	06/02/2020	1 P 28		0.30	0.00 Receipt and review emails regarding potential settlement.	660
1718740.00	06/10/2020	2 P 45		2.00	0.00 update research re court definitions bona fide.	661
1718740.00	06/15/2020	2 P 45		2.70	0.00 Continued work on declaration and brief in support of attorney's fee	663

Detail Fee Transaction File List
GABRIEL BERRY & WESTON, L.L.P.

<u>Client</u>	<u>Trans Date</u>	<u>Tmk</u>	<u>H Tcode/ P Task Co</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref</u>
Client ID 1718740.00 Wheatley Estate/Jennifer							
1718740.00	06/16/2020	2	P 45		3.50	0.00	petition, research of case law. Research and drafting of declaration and brief in support of attorney's fees petition.
							662

Total for Client ID 1718740.00

Billable	553.30	110,813.57	Wheatley Estate/Jennifer
Non-billable	10.52	1,948.50	Estate Probate
Total	563.82	112,762.07	

GRAND TOTALS

Billable	553.30	110,813.57
Non-billable	10.52	1,948.50
Total	563.82	112,762.07

Billable	110,813.57
RWG credit for probate	-150.00
CDS credit for probate	-4,236.07

Adjusted Total \$106,427.50